

REMARKS

In the April 5, 2004 Office Action, the Examiner noted that claims 11-28 were pending; rejected claims 11, 12, 15-18, 21-24, 27 and 28 under 35 U.S.C. § 102(a); and rejected claims 13, 14, 19, 20, 25 and 26 under 35 U.S.C. § 103(a). In rejecting the claims, the Examiner cited U.S. Patent No. 6,003,037 to Kassabgi et al. (Reference B in the Office Action) and at least the first (Reference AH) of four articles by Robinson et al. cited in the Information Disclosure Statement filed upon entering the national phase on August 16, 2001. Claims 11-28 remain in the case. The Examiner's rejections are traversed below.

Rejections under 35 U.S.C. § 102(a)

In item 3 on pages 2-3 of the Office Action, claims 11, 12, 15-18, 21-24, 27 and 28 were rejected under 35 U.S.C. § 102(a) as anticipated by Kassabgi et al. In making this rejection, the Examiner cited Figs. 2a-2g and column 3, lines 25-44 of Kassabgi et al. as disclosing the "interconnection component, and not the container, containing information required for interconnection of the components (e.g., claim 11, last two lines). The independent claims all recite "components surrounded by a container" (e.g., claim 11, line 3). This is consistent with the specification which describes "a container which surrounds the components" in paragraph [0005] and in the next to the last sentence of paragraph [0011]. As noted in paragraph [0008], this provides the benefit that "special container configurations can thus be considerably reduced" because the container does not need to provide the information for interconnecting the components therein.

Nothing has been cited or found in Kassabgi et al. that teaches or suggests **excluding** from the container information for interconnecting the components contained therein. What is described in the cited portions of Kassabgi et al. is providing "'smart links,' between encapsulated, individually designed software components referred to as 'smart objects'" (column 2, lines 30-32). Only two references to container objects have been found in Kassabgi et al.: container object 18 in Fig. 1 and a container without a reference numeral in Fig. 2g. In both cases, at least one smart object within the container includes a smart link to the container object. In Fig. 1, container object 18 has links to a user interface builder 16, similar to the smart links from smart objects 22, 24, 30 and 32 to user interface builder 16. Only container object 18 in Fig. 1 is illustrated and described as having more than one smart object therein and no description of interconnections between the smart objects 20, 28 encapsulated by container object 18 has been found. The smart links from smart objects 20, 28 are connected to container object 18

and, as described at column 3, lines 5-14, at run time the smart links from smart objects 20, 28 to container object 18 are automatically merged with smart links from container object 18 to user interface builder 16. Thus, there is nothing in Kassabgi et al. to anticipate the requirement in the independent claims of an "interconnection component, **not the container**, containing information required for interconnection of the components" (claim 11, last two lines, emphasis added) encapsulated by the container.

Furthermore, it is submitted that there is no suggestion that the smart links disclosed by Kassabgi et al. correspond to "an interconnection component" (e.g., claim 11, lines 4-5). Rather, a "set of smart links sufficient for coordinating a core group of smart objects 12 for building a substantial variety of database management applications 14 is included in the programming environment" (column 2, lines 34-37). Additional smart links "can be created using developer defined attributes" (column 3, lines 45-46) and "[n]ew link types can also be defined as part of the design of new object types" (column 3, lines 65-66). Thus, from the description in Kassabgi et al., one of ordinary skill in the art would understand "smart links" to be something provided separately in the programming environment rather than a particular type of component or object, as recited in the claims. Nothing has been cited or found that would make it obvious to one of ordinary skill in the art to define an interconnection component as recited in the claims to define interconnections between other components within a container and remove the definition of internal component interconnections from being associated with the container object.

For the above reasons, it is submitted that claims 11, 12, 15-18, 21-24, 27 and 28 patentably distinguish over Kassabgi et al.

Rejections under 35 U.S.C. § 103(a)

In item 4 on page 4 of the office Action, claims 13, 14, 19, 20, 25 and 26 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kassabgi et al. in view of Robinson et al. The only teaching cited in Robinson et al. is that "interconnection of ActiveX components was well known in the art" (Office Action, page 4, lines 8-9). Nothing has been cited or found in any of the parts of Robinson et al. included in the Information Disclosure Statement filed August 16, 2001 that would suggest modification of Kassabgi et al. to include the smart links or other definition of interconnections in a component or object instead of defining these interconnections as part of the container object. Therefore, it is submitted that claims 13, 14, 19, 20, 25 and 26 patentably distinguish over Kassabgi et al. in view of Robinson et al. for the reasons discussed above.

Summary

It is submitted that the references cited by the Examiner, taken individually or in combination, do not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 11-28 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

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By: Richard A. Gollhofer
Richard A. Gollhofer
Registration No. 31,106

1201 New York Avenue, NW, Suite 700
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501